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6 Attorney for the Plaintiff  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10 \* \* \*

11 UNITED STATES OF AMERICA, ) **2:14-cr-138-JAD-VCF**  
12 )  
13 Plaintiff, )  
14 )  
15 vs. )  
16 )  
17 Defendant. )  
18 \_\_\_\_\_)

19 **STIPULATION TO CONTINUE SENTENCING HEARING**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
21 United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for  
22 the United States of America, and Russell E. Marsh, Esq., counsel for Defendant CHARLES  
23 RAY BELL, JR., that the sentencing hearing for the above-captioned matter, currently scheduled  
24 for September 6, 2016, at the hour of 10:00 a.m., be vacated and continued to September 20,  
25 2016, at the hour of 11:00 a.m. The parties also stipulate and agree that the Government's  
26 response to the Defendant's Sentencing Memorandum will be due on September 9, 2016.  
27 Counsel for the Defendant may file any supplemental points and authorities, if any, no later than  
28 September 14, 2016.

This stipulation is entered for the following reasons:

1. Counsel for the Government needs additional time to respond to arguments contained in the Defendant's Sentencing Memorandum, at least one of which is an issue of first impression before this Court.

2. The Defendant is in custody, but he does not object to the continuance.

3. Denial of this request for a continuance of the sentencing hearing could potentially prejudice both parties and/or unnecessarily consume resources.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

DATED: August 30, 2016.

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/s/  
PHILLIP N. SMITH, JR.  
Assistant United States Attorney  
Counsel for the United States

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/s/  
RUSSELL E. MARSH, ESQ.  
Counsel for Defendant CHARLES BELL

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA, ) 2:14-cr-138-JAD-VCF  
                                  )  
                                  )  
                                  )  
Plaintiff, ) ORDER CONTINUING  
                                  )  
                                  )  
                                  )  
vs. ) SENTENCING HEARING  
                                  )  
                                  )  
CHARLES RAY BELL, JR., )  
                                  )  
                                  )  
Defendant. )

## ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS  
HEREBY ORDERED**, that the sentencing hearing in the above-captioned matter, currently  
scheduled for September 6, 2016 at the hour of 10:00 a.m., be vacated and continued to  
September 20, 2016 at the hour of 11:00 a.m.

**IT IS FURTHER ORDERED**, that the Government shall file a response to the Defendant's Sentencing Memorandum no later than September 9, 2016, and the Defendant shall file any supplemental points and authorities, if any, no later than September 14, 2016.

DATED: 8/30/2016

UNITED STATES DISTRICT JUDGE